

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION**

**B.P., et al.,**

**Plaintiffs,**

**v.**

**No: 2:23-cv-00071-TRM-JEM**

**CITY OF JOHNSON CITY, TENNESSEE, et al.,**

**Defendants.**

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**NOTICE OF LODGING DOCUMENTS UNDER SEAL**

**TO THE COURT AND ITS ATTORNEYS OF RECORD:**

Plaintiffs hereby give notice that they are provisionally lodging under seal Exhibits 2, 3, and 4 to the Declaration of Vanessa Baehr-Jones in support of Plaintiffs' Opposition to Defendant Johnson City's Motion for Protective Order and/or Motion to Quash *Subpoena Duces Tecum* Issued to Verizon Wireless ("Plaintiffs' Opposition").

Exhibits 2 and 3 are excerpted transcripts of JCPD officers and Exhibit 4 contains phone records produced by Kevin Peters. Plaintiffs are filing provisionally under seal because, as set forth in the accompanying declaration, counsel for Defendants have designated them "Confidential."

Sealed filing is appropriate for the reasons set forth in the Declaration of Vanessa Baehr-Jones, namely, these exhibits have been designated "confidential" by Defendants. Plaintiffs therefore request the Court set a briefing schedule for any motions to seal Defendants intend to bring, and in the interim, provisionally seal Exhibits 2, 3, and 4.

Dated: September 12, 2024

Respectfully submitted,

Advocates for Survivors of Abuse PC

/s/ Vanessa Baehr-Jones

Vanessa Baehr-Jones CABN # 281715

*Pro Hac Vice*

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*Attorneys for Plaintiffs and Proposed Classes*

## **CERTIFICATE OF SERVICE**

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on September 12, 2024 to counsel of record:

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/s/ Elizabeth Kramer  
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